

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

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| INNOVATION PRODUCTS, INC., | § |
| | § |
| Plaintiff, | § |
| | § |
| v. | § C.A. No. _____ |
| | § |
| M/V SEA TRAIN | § |
| her engines, tackle, etc., <i>in rem</i> ; | § |
| SEA BRIDGE SHIPPING | § |
| MANAGEMENT CO., LTD.; | § |
| HONGKONG NEW SILK ROAD | § |
| SHIPPING LIMITED; and | § |
| COOPER/PORTS AMERICA, LLC, | § |
| <i>in personam</i> , | § |
| | § |
| Defendants. | § |

**SCHEDULE A
(IN SUPPORT OF PLAINTIFF'S ORIGINAL COMPLAINT)**

PLAINTIFF'S LEGAL STATUS

Plaintiff Innovation Products, Inc. was and is a New York corporation with an office for the transaction of business at 849 39th Street, Brooklyn, New York, 11232.

DEFENDANTS' LEGAL STATUS

Defendant, Sea Bridge Shipping Management Co., Ltd. ("Sea Bridge"), was and is a Chinese corporation with an office for the transaction of business at Building 29, Haiyin Changtian, Lingshanwei Street, Huangdao District, Qingdao. At all material times hereto, Sea Bridge was and is the owner, owner pro hac vice, charterer, operator, and/or manager of the M/V SEA TRAIN.

Defendant, Hongkong New Silk Road Shipping Limited (“Silk Road”), is a Chinese company with and office for the transaction of business at Room 1401, 14th Floor, World Commerce Centre, 7-11, Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong, China. At all material times hereto, New Silk Road was and is owner, owner *pro hac vice*, charterer, operator, and/or manager of the M/V SEA TRAIN.

Defendant, Cooper/Ports America, LLC (“C/PA”), is a domestic limited liability company with is principal place of business in Alabama, doing business in the state of Texas for the purpose of monetary profit. C/PA is in the commercial business of providing stevedoring services to ocean vessels at the port of Houston, Texas. C/PA may be served with process through its registered agent, David Morgan, 2315 McCarty Drive, Houston, Texas.

Defendant, M/V SEA TRAIN was an ocean carrying vessel of cargo set forth in, and pursuant to, a contract of carriage described below; at all relevant times, said vessel was and is owned, chartered, operated and/ or managed by Defendant, Sea Bridge Shipping Management Co., Ltd., Building 29, Haiyin Changtian, Lingshanwei Street, Huangdao District, Qingdao and/or Hongkong New Silk Road Shipping Limited, Room 1401, 14th Floor, World Commerce Centre, 7-11, Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong. M/V SEA TRAIN may be within the district during the pendency of this action.

PARTICULARS OF CLAIM

Carrying Vessel: M/V SEA TRAIN - Voyage No. 2101

Port of Loading: Qingdao, China

Port of Discharge: Houston, Texas, USA

Bill of Lading: Nos. SXUQSTQDHU01, SXUQSTQDHU02

Shipper: Jiangsu High Hopes Arser Co., Ltd.
7F, High Hope Mansion, No.91Baixia Road
Nanjing, China

Consignee: Innovation Products, Inc.
849 39th Street
Brooklyn, New York 11232

Notify Party: Innovation Products, Inc.
849 39th Street
Brooklyn, New York 11232

Cargo: 285 Crates Commercial Plywood

Nature of Loss: Damage

Amount of Loss: \$827,144.48

Kennedy Lillis Schmidt & English Reference: 6446